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April 18, 2023

**Via ECF**

Honorable Jennifer L. Rochon  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: Watson v. New York City Economic Development Corp., et al.  
Civil Action No.: 22-cv-01660-JLR

Dear Judge Rochon:

We represent Plaintiff Jerald Watson (“Plaintiff”) in the above-referenced matter and submit this request on consent with Defendants New York City Economic Development Corporation and Hester Muis (collectively “Defendants”).

The parties have been referred to Magistrate Judge Katherine H. Parker for a settlement conference. The parties have their first telephone conference scheduled with her for April 25, 2023.

Therefore, the parties request that the April 26<sup>th</sup> pre-trial conference with Your Honor be adjourned until after the settlement conference which should be scheduled shortly. This is the first request for an adjournment of this conference.

In addition, the parties respectfully request that the deadline to complete discovery in Your Honor’s January 25, 2023 Amended Civil Scheduling Order (Dkt. #37) be extended to June 22, 2023. This is the third request for an extension of these deadlines.

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We thank Your Honor for consideration of this matter.

Respectfully submitted,

/s/Debra L. Wabnik

Debra L. Wabnik

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cc: Meredith Cavallaro, Esq.  
Lisia Leon, Esq.  
Elisabeth Ponce, Esq.  
Paduano & Weintraub LLP


The requests are GRANTED in part and DENIED in part.

The request to extend discovery is **DENIED**. This is the third request and no reason, let alone a good reason, has been provided for the request.

The Court grants the request to adjourn the April 25, 2023 conference. The conference is adjourned to **June 16, 2023 at 10:30AM**.

Dated: April 19, 2023  
New York, New York

**SO ORDERED.**

  
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**JENNIFER L. ROCHON**  
United States District Judge